



APR 03 2019

Jason R. Flanders
Aqua Terra Aeris Law Group
490 43rd Street, Suite 108
Oakland, CA 94609
(916) 202-3018
jrf@atalawgroup.com

March 28, 2019

VIA CERTIFIED MAIL

Howard L. Herman, President
Sonoma Horse Park
7600 Lakeville Highway
Petaluma, CA 94954

Sally Hudson, President
Headlands Management, Inc.
1 Ivy Street
Monterey, CA 93940

Howard L. Herman, Registered Agent
Sonoma Horse Park, *doing business as*
Riverside Equestrian Center
7600 Lakeville Highway
Petaluma, CA 94954

Meredith M. Herman, Registered Agent
Burgundy Farms, LLC
1033 Broadway
San Francisco, CA 94133

Re: Notice of Violations and Intent to File Suit Under the Federal Water Pollution Control Act and Resource Conservation and Recovery Act

Dear Mr. Herman, Ms. Hudson, and Ms. Herman:

This letter provides notice that San Francisco Baykeeper ("Baykeeper") intends to file suit pursuant to Section 301(a) of the Federal Water Pollution Control Act ("Clean Water Act," or "CWA"), 33 U.S.C.A. section 1331, against Sonoma Horse Park, Sonoma Horse Park doing business as Riverside Equestrian Center ("Riverside Equestrian"), Headlands Management, Inc. ("Headlands Management"), and Burgundy Farms, LLC ("Burgundy Farms") for violating the CWA with regard to unpermitted discharges of pollutants from a point source into waters of the United States. Additionally, Baykeeper intends to file suit pursuant to section 7002(a)(1)(B) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. section 6972(a)(1)(B), for violations of RCRA by contributing to the past or present handling, storage, treatment, and/or disposal of any solid or hazardous waste, which may present an imminent and substantial endangerment to health and the environment.

1. INTRODUCTION

The violations at issue are occurring on property located at 7600 Lakeville Highway, Petaluma, CA 94954, known as Sonoma Horse Park. Sonoma Horse Park, and Sonoma Horse



Park doing business as Riverside Equestrian Center, is owned by Howard L. Herman; Sonoma Horse Park's equestrian shows are managed by Sally Hudson of Headlands Management. Burgundy Farms also lists its principal place of business as 7600 Lakeville Highway, and it is in the business of equestrian management, including equine sales, boarding, and training. These entities and individuals are collectively referred to hereafter as "You" and/or "Sonoma Horse Park Owners and Operators" and/or "Notice Recipients".

This notice of violations and intent to file suit ("Notice Letter") is being sent to You as the responsible Sonoma Horse Park Owners and Operators. The purpose of this letter is to provide notice of the Notice Recipients' CWA and RCRA violations, and to give notice that, after the expiration of sixty (60) days from the date of this letter, Baykeeper intends to file a complaint regarding the violations of the Clean Water Act that are occurring at Sonoma Horse Park; and after the expiration of ninety (90) days from the date of this letter, Baykeeper intends to file a complaint regarding the violations of RCRA that are occurring at Sonoma Horse Park.

Baykeeper has investigated Sonoma Horse Park to determine the severity of activities potentially violating the CWA and RCRA. Based on information and belief, Baykeeper alleges that Sonoma Horse Park has more than 500 horses present for more than 45 days per year. Baykeeper is informed and believes that at least 5,000 horses were present at Sonoma Horse Park between September 23, 2017 and September 23, 2018. Facilities with more than 500 horses for more than 45 days in a 12-month period are classified as Concentrated Animal Feeding Operations ("CAFOs"). 40 C.F.R. § 122.23. CAFOs are point sources under the CWA. 33 U.S.C. § 1362. As point sources, CAFOs may not discharge pollutants to waters of the United States except in compliance with a NPDES permit. 33 U.S.C. § 1311(a). Failure of the Notice Recipients to obtain a NPDES permit for Sonoma Horse Park is a violation of section 301 of the CWA. *See* 40 C.F.R. § 122.21(d)(1).

Horse CAFOs produce a substantial amount of pollutants including manure, bedding, and process wastewater from the horse wash racks. Such animal waste and process wastewater discharged from Sonoma Horse Park are and/or contain "pollutants," as defined in CWA section 502(6), 33 U.S.C.A. section 1362(6) and 40 C.F.R. section 122.2. Manure contains high levels of phosphorus and nitrogen. As a result of unlawful discharges to the Petaluma River, including stormwater runoff from areas where horse waste is stored, and unlawful land application of process wastewater, the Notice Recipients have caused and continue to cause discharge of animal waste, nitrates, nitrites, nitrogen, ammonia, phosphorus, bacteria and endotoxin, sulfate, and other pollutants into waters of the United States, resulting in substantial harm to public health, welfare, and the environment. The Petaluma River is a CWA section 303(d) listed impaired water body for several pollutants known to be present at Sonoma Horse Park, including fecal pollutants (*i.e.*, *E.coli*), nitrogen, and phosphorus. Unpermitted discharges from Sonoma Horse Park cause and contribute to the impairment of the Petaluma River.



In addition to pollutants typically associated with CAFOs, Baykeeper is informed and believes that trash and debris are discharged from Sonoma Horse Park into waters of the United States. At least two site investigations revealed discharges of trash items, such as beverage containers (*i.e.*, plastic cups).

These individual examples of failure to comply with the requirements of the Clean Water Act, and those referenced below, are indicative but not exhaustive of activities, or failure to conduct necessary activities, occurring at the Sonoma Horse Park property in violation of the Clean Water Act.

As set forth in this Notice Letter, observations made by Baykeeper investigators indicate that the Notice Recipients are and continue to be in violation of the Clean Water Act. Generally, the Sonoma Horse Park Owners and Operators have not obtained a NPDES permit pursuant to section 402 of the Clean Water Act, 33 U.S.C. section 1342, and have routinely discharged pollutants into the Petaluma River. Each day that pollutants such as manure, process wastewater, trash, footing, and contaminated stormwater are discharged constitutes a separate violation of section 301 of the Clean Water Act, 33 U.S.C. section 1311.

Section 505(b) of the Clean Water Act, 33 U.S.C. section 1365(b), requires that sixty (60) days prior to the initiation of a civil action against any alleged violator under section 505(a) of the Clean Water Act, 33 U.S.C. section 1365(a), a citizen must give notice of her intent to sue to the discharger, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator for the EPA for the region in which such violation is alleged to have occurred, and the Chief Administrative Officer of the water pollution control agency for the state in which the violation is alleged to have occurred. 33 U.S.C. § 1365(b)(1)(A); 40 C.F.R. § 135.2(a)(1). This letter addresses at least 1,825 violations of section 301 of the Clean Water Act, 33 U.S.C.A. section 1311.

Section 7002(b)(2)(A) of RCRA, 42 U.S.C. section 6972(b)(2)(A), requires that ninety (90) days prior to initiation of a civil action against any alleged violator under section 7002(a)(1)(B) of RCRA, 42 U.S.C. section 6972(a)(1)(B), a citizen must give notice of her intent to sue the discharger to the Administrator of the EPA and the State in which the alleged endangerment may occur, and to any person alleged to have contributed to or to be contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste that may present conditions of imminent and substantial endangerment.

The CWA and RCRA are strict liability statutes to which few if any defenses may be available. Accordingly, we encourage and welcome early dialogue between the parties to attempt to resolve these deficiencies as early as possible.



2. FACTUAL BACKGROUND

2.1 San Francisco Baykeeper

San Francisco Baykeeper is an environmental group, organized as a non-profit corporation in accordance with the laws of the State of California, whose mission is to protect San Francisco Bay from the biggest threats and hold polluters accountable. Baykeeper works to stop pollution, in part, by monitoring and investigating pollution and its sources with the end goal of a Bay that is free from harmful pollution and safe for recreation with resilient, healthy shorelines. Additionally, Baykeeper actively seeks federal and state agency implementation of the Clean Water Act and, where necessary, initiates enforcement actions on behalf of itself and its members. Baykeeper's offices are located at 1736 Franklin Street, Suite 800, Oakland, CA, 94612.

Baykeeper and its individual members have an interest in the preservation and use of waters in and around San Francisco Bay, including, but not limited to the Pacific Ocean, San Francisco Bay, San Pablo Bay, the Petaluma River, and their tributaries. Specifically, Baykeeper's members sail, swim, picnic, fish, hike, surf, paddle, standup paddleboard, kayak, wade, bike, and enjoy the wildlife in and around these waters, including the reach at issue in this Notice Letter. The actions of the Notice Recipients individually, collectively, and in combination with the activities of other landowners adjacent to the Petaluma River, result in numerous injuries to Baykeeper's interests, such as: loss, destruction, or damage to wetlands and waterways; diminished aesthetic enjoyment; loss of open space and habitat for wildlife, including wading birds and federally protected species; degraded water quality; and diminished quality of life. The ability of Baykeeper's members to sail, swim, picnic, fish, hike, surf, paddle, standup paddleboard, kayak, wade, bike, and enjoy the wildlife in and around these waters, and to use and enjoy the Petaluma River, San Pablo Bay, and San Francisco Bay, is harmed by Notice Recipients' violations of law.

2.2 Sonoma Horse Park; Riverside Equestrian Center; Burgundy Farms, LLC; and Headlands Management, Inc.

This Notice Letter is being sent to Howard L. Herman as the owner and/or operator of Sonoma Horse Park and Sonoma Horse Park doing business as Riverside Equestrian Center. The Notice Letter is addressed to Headlands Management and Burgundy Farms as operators at Sonoma Horse Park. Collectively, these entities are the owners and/or operators of the property and responsible parties under the Clean Water Act.

Sonoma Horse Park is a business corporation incorporated under the laws of the State of California. It is located at 7600 Lakeville Highway, Petaluma, CA 94954. Howard L. Herman is



the President and an owner and/or operator of Sonoma Horse Park. Marcia E. Herman is the Secretary and an owner and/or operator of Sonoma Horse Park. Ashley B. Herman is the Chief Financial Officer and an owner and/or operator of Sonoma Horse Park. Upon information and belief, Meredith M. Herman is an owner and/or operator of Sonoma Horse Park (collectively, the "Herman family"). Sonoma Horse Park does business under the fictitious business name Riverside Equestrian Center, also located at 7600 Lakeville Highway, Petaluma, CA 94954.¹

Upon information and belief, Burgundy Farms, LLC, has operated as an equine sales, training, and boarding entity at Sonoma Horse Park since at least 2013. Meredith M. Herman is an owner and/or operator of Burgundy Farms. Burgundy Farms was formed as a limited liability corporation under the laws of the State of California.

Upon information and belief, Baykeeper alleges that Sonoma Horse Park, and/or Sonoma Horse Park doing business as Riverside Equestrian Center, and/or Burgundy Farms provides equine boarding accommodations to approximately 250 horses for up to 365 days a year. Sonoma Horse Park is the largest horse boarding facility in Northern California and the second largest in the western United States. Upon information and belief, Sonoma Horse Park can accommodate up to 2,000 horses per show and had at least 5,000 horses present on-site in 2018.

Information available to Baykeeper indicates that Sonoma Horse Park encompasses at least 70.8 acres and has been owned and/or operated by Howard L. Herman and/or the Herman family since 1997.

Upon information and belief, Headlands Management, Inc., has managed all equine shows at Sonoma Horse Park since 2010. Sally Hudson is an owner and/or operator of Headlands Management. Headlands Management is incorporated under the laws of the State of California.

Headlands Management, Inc., manages multiple equestrian competitions and shows at Sonoma Horse Park throughout the year. In 2018, Headlands Management managed eight shows at Sonoma Horse Park, each spanning 5-day periods. Per the "Rules and General Information" provided by Headlands Management, horses may arrive on-site at Sonoma Horse Park up to 3 days in advance of a show.² Upon information and belief, Sonoma Horse Park accommodates at least 700 entrants per show. Upon information and belief, Sonoma Horse Park can temporarily board up to 2,000 horses per show.

The Clean Water Act provides that the owner and operator of the land where operations are taking place is responsible for compliance with the provisions of the CWA. For example, three district courts within the Ninth Circuit have held that a party may be liable under the CWA for unlawful storm water discharges associated with industrial activities if the party exercises

¹ See, Attachment 1.

² See, Attachment 2.



sufficient control over a facility that discharges unlawful pollutants, even if the party did not create the discharges. See *Puget Soundkeeper Alliance v. Cruise Terminals of Am., LLC*, No. C14-0476 JCC, 2014 U.S. Dist. LEXIS 130700, 2014 WL 4649952, at *4 (W.D. Wash. Sep. 16, 2014) ("*Puget Soundkeeper I*"); *Puget Soundkeeper All. v. Cruise Terminals of Am., LLC*, 216 F. Supp. 3d 1198, 1223-25 (W.D. Wash. 2015) ("*Puget Soundkeeper II*"); *Resurrection Bay Conservation Alliance v. City of Seward*, No. 3:06-cv-0224-RRB, 2008 U.S. Dist. LEXIS 13667, at *12-18 (D. Alaska Feb. 21, 2008); *Cal. Sportfishing Prot. Alliance v. Shiloh Grp., LLC* (N.D.Cal. 2017) 268 F. Supp. 3d 1029, 1045-1046.

2.3 The Petaluma River

The Petaluma River is located in southern Sonoma County and a small portion of northeastern Marin County. It is the eleventh largest tributary to San Francisco Bay, draining a 146-square-mile watershed into the northwestern part of San Pablo Bay.

The lower twelve miles of the Petaluma River flow through the saline Petaluma Marsh before discharging into San Pablo Bay. The Petaluma Marsh is the largest remaining natural tidal brackish marsh in California. The marsh covers approximately 5,000 acres and is surrounded by approximately 7,000 acres of reclaimed wetlands. Sonoma Horse Park is located on the bank of the Petaluma River in the middle of the Petaluma Marsh and is surrounded by brackish and tidally-influenced wetlands.³ Riparian corridors run throughout the Sonoma Horse Park property and feed into the Petaluma River.⁴ Furthermore, Sonoma Horse Park sits within a designated floodplain.

The whole river system maintains a variety of marine, estuarine, and freshwater fish species, including salmonids which use it as habitat for spawning, rearing, and migration. The Petaluma River has specifically been identified as critical habitat for many of the protected species found there such as steelhead, Chinook salmon, longfin smelt, and green sturgeon, as well as great egret, California brown pelican, California clapper rail, and California black rail. Many of these species depend specifically on marshlands such as those near Sonoma Horse Park. The Petaluma River's designated beneficial uses include cold freshwater habitat, fish migration, preservation of rare and endangered species, fish spawning, warm freshwater habitat, water contact recreation, non-water contact recreation, estuarine habitat, navigation, and wildlife habitat.

The San Francisco Bay Regional Water Quality Control Board has designated the Petaluma River as impaired for fecal indicator bacteria and for excessive algae growth:

³ See, Attachment 3.

⁴ See, Attachment 4.



Since 1975, the main stem of Petaluma River has been on the 303(d) list for impairment from elevated levels of fecal indicator bacteria (FIB). High FIB levels indicate presence of pathogenic organisms that are found in warm-blooded animal (e.g., human, cows, horses, dogs, etc.) waste and pose potential health risks to people who recreate in contaminated waters. Since 1986, the river has also been listed as impaired due to excessive algae growth, known as eutrophication, which is caused by high nutrient (nitrogen and phosphorus) levels. Eutrophic waters, which are symptomatic of excessive algae or aquatic plant growth, can significantly alter dissolved oxygen levels and pH, which are critical to aquatic wildlife and can also impact recreational beneficial uses....

Draft Project Report, Total Maximum Daily Load for Bacteria and Nutrient Impairment Analysis in Petaluma River, p. 1 (April 2018).⁵

The Petaluma River is a water of the United States as defined in the Clean Water Act. The U.S. Army Corps of Engineers defines water of the United States as all waters which are currently used in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide, which are used for, among other purposes, the harvesting of fish sold in interstate commerce. 33 C.F.R. § 328.3(a)(1)(i). The Petaluma River is used for interstate or foreign commerce, and is subject to the ebb and flow of the tide. Waters tributary to these waters are also waters of the United States. *See* 33 C.F.R. § 328.3(a)(5). The waters of the Pacific Ocean, San Francisco Bay, and San Pablo Bay at the Petaluma River are subject to the ebb and flow of the tides, and are currently used in interstate or foreign commerce. The Petaluma River is tributary to San Pablo Bay and San Francisco Bay, and is therefore a water of the United States.

3. LEGAL BACKGROUND

3.1 CWA Permit Requirements for CAFOs

a. Definition of a CAFO

Section 301 of the CWA, 33 U.S.C. section 1311(a), prohibits the discharge of pollutants into waters of the United States by any person from a point source without a permit. The CWA definition expressly includes concentrated animal feeding operations (“CAFOs”) as point sources. 33 U.S.C § 1362(14). Thus, any CAFO that discharges pollutants to a water of the U.S. must be permitted to do so.

⁵ *Total Maximum Daily Load for Bacteria and Nutrient Impairment Analysis In Petaluma River*, [https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/petalumabacterianutrients/Draft%20Petaluma%20River%20Bacteria%20TMDL%20Project%20Report%20\(04-12-18\).pdf](https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/petalumabacterianutrients/Draft%20Petaluma%20River%20Bacteria%20TMDL%20Project%20Report%20(04-12-18).pdf). *See*, pages 1-3 (accessed on January 9, 2019).



To be a CAFO a facility must meet a two-part test. First, a facility must be an Animal Feeding Operation (“AFO”). An AFO is defined as:

a lot or facility (other than an aquatic animal production facility) where the following conditions are met:

- (i) Animals (other than aquatic animals) have been, are, or will be stabled or confined and fed or maintained for a total of 45 days or more in any 12-month period, and
- (ii) Crops, vegetation, forage growth, or post-harvest residues are not sustained in the normal growing season over any portion of the lot or facility.

40 C.F.R. § 122.23. The EPA considers an animal to be at the facility for a full day if it is at the facility for any portion of a day.⁶ Additionally, the 12-month period is any 12-month period and need not correspond with a calendar year.⁷ The EPA further clarifies that crops, vegetation, forage growth, or post-harvest residues do not include incidental growth on small portions of the confinement area.⁸

Second, an AFO must confine the necessary numbers and types of animals to be classified as a CAFO. For horses, there must be 500 horses or more for the facility to be classified as a large CAFO. 40 C.F.R. § 122.23(4)(vi). A facility is a medium CAFO if it has 150-499 horses and it either: (1) discharges “into waters of the United States through a man-made ditch, flushing system, or other similar man-made device”; or (2) “[p]ollutants are discharged directly into waters of the United States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.” 40 C.F.R. § 122.23(6). Every discharge of pollutants from a CAFO into waters of the United States without a permit is a violation of section 301 of the CWA, 33 U.S.C.A. § 1311.

b. Permitting Requirements for CAFOs

The requirements of a CWA permit for a CAFO are the same as those issued to other point sources. A permit must include technology-based effluent limitations that constitute the “Best Available Technology” (“BAT”) and “Best Conventional Pollution Control Technology” (“BCT”).⁹ A permit must also include more stringent water quality-based effluent limitations

⁶ NPDES Permit Writers' Manual for CAFOs. https://www.epa.gov/sites/production/files/2015-08/documents/cafo_permitmanual_chapter2.pdf (accessed on January 9, 2019).

⁷ *Id.*

⁸ *Id.*

⁹ The CWA required all point source dischargers to achieve effluent limitations based upon BAT for toxic and nonconventional pollutants and BCT for “conventional” pollutants by March 31, 1989. 33 U.S.C. § 1311(b); 40 C.F.R. § 125.3(a)(2)(ii)-(iii). Conventional pollutants are TSS, oil and grease, pH, biochemical oxygen demand



when necessary to ensure that the facility does not cause or contribute to a violation of a water quality standard.

Federal regulations include specific requirements for CAFOs that discharge processed wastewater, including any stormwater or other water that comes into contact with manure or bedding and the water from the wash racks. 40 C.F.R. § 122.23.¹⁰ Large horse CAFOs must retain (*i.e.*, not discharge) all of their process wastewater. 40 C.F.R. § 412.13(a). The discharge of process wastewater is permissible only when rainfall events cause an overflow from a facility designed to contain all process wastewater plus the runoff from a 25-year, 24-hour rainfall event. 40 C.F.R. § 412.13(6).

In addition, all permits authorizing the discharge of processed wastewater must require implementation of a nutrient management plan (NMP) that, at a minimum, contains best management practices necessary to meet enumerated requirements and applicable effluent limitations and standards. 40 C.F.R. § 122.42(e)(1). Those enumerated requirements include: (1) manure and process wastewater storage; (2) management of mortalities; (3) diversion of clean water from the production area; (4) prevention of direct contact of confined animals to waters of the U.S.; (5) treatment systems specifically designed for appropriate chemical and contaminant management; (6) conservation practices; (7) protocols for testing manure, litter, process wastewater, and soil; (8) protocols for applying manure, litter, or process wastewater in accordance with the site-specific NMP; and (9) record keeping. The terms of the NMP are enforceable effluent limitations that must be included in the permit.

Stormwater discharges from large CAFOs are also subject to permitting requirements because they are defined as industrial activities. 40 C.F.R. § 122.26; Industrial Stormwater Permit, Attachment A.1. Thus, in California, a large CAFO should seek coverage under the Industrial Stormwater Permit for its stormwater discharges, unless those discharges are otherwise covered by another CWA permit. Every discharge of stormwater from an area of industrial activity at a CAFO into waters of the U.S. without industrial stormwater permit coverage is a violation of section 301 of the Clean Water Act, 33 U.S.C. section 1311.

The Industrial Stormwater Permit requires that a facility implement BMPs that meet BAT/BCT to control stormwater pollution. The Industrial Stormwater Permit also prohibits stormwater discharges that cause or contribute to a violation of water quality standards. Where a

("BOD"), and fecal coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. *Id.*; 40 C.F.R. § 401.15.

¹⁰ "Process wastewater means water directly or indirectly used in the operation of the AFO for any or all of the following: spillage or overflow from animal or poultry watering systems; washing, cleaning, or flushing pens, barns, manure pits, or other AFO facilities; direct contact swimming, washing, or spray cooling of animals; or dust control. Process wastewater also includes any water which comes into contact with any raw materials, products, or byproducts including manure, litter, feed, milk, eggs or bedding." 40 C.F.R. § 122.23.



waterbody is listed as impaired for a specific pollutant, any discharge of that pollutant can be found to cause or contribute to a violation of water quality standards. In addition, the specific CAFO requirements listed above, such as BAT/BCT, retention of process wastewater, and an NMP that meets effluent limitations and standards, continue to apply.

3.2 Legal Background Under RCRA

The Resource Conservation and Recovery Act (“RCRA”) creates a framework for the proper management of solid waste. RCRA “is a comprehensive environmental statute that governs the treatment, storage, and disposal of solid and hazardous waste.” *Meghrig v. KFC W., Inc.*, 516 U.S. 479, 483 (1996).

RCRA prohibits the disposal of solid waste, except at a sanitary landfill or hazardous waste disposal facility. 42 U.S.C. §§ 6945(a), 6903(14). “Disposal” is defined as “the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste . . . or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.” *Id.* at § 6903(3). Under RCRA, the definition of “solid waste” is broad and includes “any garbage, refuse, . . . and other discarded material, including solid, liquid, semisolid or contained gaseous material resulting from . . . agricultural operations . . .” 42 U.S.C. § 6903(27). Manure has been held to be a RCRA “solid waste.” *See Cmty. Ass’n for Restoration of the Env’t v. Cow Palace, LLC*, 80 F. Supp. 3d 1180, 1220 (E.D. Wash. 2015).

RCRA also creates a private cause of action against a person “who has contributed or who is contributing to the past or present handling, storage, treatment, transportation, or disposal of any solid or hazardous waste which may present an imminent and substantial endangerment to health or the environment.” 42 U.S.C. § 6972(a)(1)(B). Liability is established when “(1) a person has ‘contributed’ or ‘is contributing’ to, (2) the ‘past or present handling, storage, treatment, transportation, or disposal of’ any ‘solid or hazardous waste,’ and (3) the waste in question ‘may present an imminent and substantial endangerment to health or the environment.’” *Cow Palace*, 80 F. Supp. 3d at 1218. Contaminated stormwater runoff may be subject to RCRA. *See Ecological Rights Foundation v. Pacific Gas and Electric Co.*, 874 F.3d 1083, 1094-1101 (9th Cir. 2017).

4. NOTICE RECIPIENTS’ FAILURE TO OBTAIN AN NPDES PERMIT

4.1 Sonoma Horse Park is a Large or Medium CAFO

Sonoma Horse Park meets the regulatory definition of an AFO. An AFO is a facility where animals are confined and fed or maintained for a total of 45 days or more in a 12-month period where crops, vegetation, or forage growth are not maintained in the normal growing



season. 40 C.F.R. § 122.23. Based upon information and belief, Sonoma Horse Park boarded up to 250 horses every day within a 12-month period between September 23, 2017 and September 23, 2018. Thus, Sonoma Horse Park is an AFO.

Due to the number of horses present during a 12-month period, Sonoma Horse Park also meets the regulatory definition of a large CAFO because it is an AFO with more than 500 horses. 40 C.F.R. § 122.23(4)(vi). Based upon information and belief, Sonoma Horse Park accommodated at least 5,000 additional horses on the premises for its equestrian show competitions in the 12-month period between September 23, 2017 and September 23, 2018:

- Sonoma Horse Park has represented in promotional material that it accommodates at least 700 horse entries per show.
- Upon information and belief, Sonoma Horse Park is permitted to accommodate up to 2,000 horses per show.
- Sonoma Horse Park held eight shows per year in 2017 and 2018.
- The Sonoma Horse Park “Featured Classic” lists for 2017 and 2018 indicate that between September 23, 2017 and September 23, 2018, horse shows took place for a total of 42 days.
- The document “Rules and General Information” provides that horses can arrive at Sonoma Horse Park up to three days in advance of each show.

Adding the number of days in advance horses may arrive on premises with the number of days in each competition, the Sonoma Horse Park 2019 “Rules and General Information” allows horses to be present on site for equestrian show purposes for 60 days total. Thus, based on information and belief, Sonoma Horse Park fits within the large CAFO parameters of 500 or more horses present for 45 days in a 12-month period, especially when considering the 250 year-round boarders. Based on information available to Baykeeper, the number of horses on site from September 23, 2017 to September 23, 2018 is representative of a typical year of equestrian events at Sonoma Horse Park. Thus, Sonoma Horse Park is a large CAFO.

Like other horse CAFOs, such as racetracks, Sonoma Horse Park generates a substantial amount of manure, bedding, process wastewater, trash, footing, and other pollutants. The amount of manure and pollutants produced at Sonoma Horse Park is a substantial source of pollution affecting water quality in both the Petaluma River and the Bay.

In the alternative, Baykeeper alleges that Sonoma Horse Park is a medium CAFO. Upon information and belief, Sonoma Horse Park boards 250 horses year-round and therefore easily satisfies the quantitative requirement that a medium horse CAFO maintain 150-499 horses for 45 days or more in a 12-month period. 40 C.F.R. § 122.23(6). In addition, a medium CAFO must discharge into waters of the United States. 40 C.F.R. § 122.23(6). Sonoma Horse Park discharges pollutants directly into the Petaluma River when water at the Facility flows through the stables,



into drainage ditches, and is then pumped into the river. Baykeeper has expert testimony as well as photographic and video evidence showing the grading of the site that demonstrates that stormwater contacts the stable area and is discharged. Moreover, the entire site is constructed to drain via pumps and pipes to the Petaluma River. Finally, erosion patterns in the soil buttress Baykeeper's allegation that Sonoma Horse Park discharges pollutants directly into waters of the United States.

4.2 Sonoma Horse Park Does Not Have NPDES Permit Coverage

A CAFO must be covered by an NPDES permit at the time it discharges. 40 C.F.R. 122.23(f). Sonoma Horse Park does not have the required NPDES permit coverage that would allow the Facility to discharge pollutants pursuant to section 402 of the CWA, 33 U.S.C. section 1342. Section 301 of the CWA, 33 U.S.C. section 1311, prohibits the discharge of a pollutant from a point source without a permit.

Thus, Baykeeper alleges that Sonoma Horse Park does not have permit coverage for either its discharges of processed wastewater or stormwater from the facility, although it routinely discharges pollutants into the Petaluma River.

4.3 Sonoma Horse Park Does Not Comply With Effluent Limitations Applicable to CAFOs

Pursuant to CWA section 402, 33 U.S.C. section 1342, a state may issue an NPDES permit which authorizes the discharge of pollutants into navigable waters of the United States, upon the condition that such discharge will meet all applicable requirements of the CWA. If issued, the state is directed to prescribe conditions for NPDES permits to assure compliance with the requirements of the CWA, including conditions on data and information collection, reporting, and other such requirements as the state deems appropriate. Among the conditions and limitations prescribed in the NPDES permits issued under CWA section 402(a), 33 U.S.C.A. section 1342(a), are effluent limitations. Effluent limitations, as defined in CWA section 502(11), 33 U.S.C.A. section 1362(11), are restrictions on the quantity, rate, and concentration of chemical, physical, biological, and other constituents of wastewater discharges.

Section 301(6), 33 U.S.C.A. section 1311(6), requires that all NPDES point sources achieve compliance with technology-based effluent limitations ("TBELs"). TBELs for CAFOs must address all discharges from a CAFO. 40 C.F.R. § 122.42(e). In general, CAFO permits include limits for process wastewater discharges from the CAFO's production and land application areas. For large horse CAFOs, production area TBELs prohibit all discharges of "process wastewater" to waters of the United States. 40 C.F.R. § 412.13(a). Process wastewater means water directly or indirectly used in operation of the AFO for activities including: washing, cleaning, or flushing AFO facilities; washing or spray cooling animals; dust control; or any water



that comes into contact with any raw materials, products, or byproducts including manure, litter, feed, milk, or bedding. 40 C.F.R. § 122.23(6)(7); 40 C.F.R. § 412.2(d). The discharge of process wastewater is permissible only when rainfall events cause an overflow of process wastewater from a facility designed, constructed, operated, and maintained to contain all process-generated wastewater plus the runoff from a 25-year, 24-hour rainfall event at the location of the point source. 40 C.F.R. § 412.13(6). Baykeeper is informed and believes, and thereon alleges, that Notice Recipients' activities at Sonoma Horse Park resulted in the discharge of process wastewater to waters of the United States directly and indirectly from each onsite wash rack. Further, Baykeeper alleges that Sonoma Horse Park discharges process wastewater into waters of the United States during dry weather and wet weather events below a 25-year, 24-hour rainfall event, which includes stormwater that has come into contact with manure or bedding and water from wash racks, in violation of TBELs.

In addition, any discharges that occur as a result of applying process wastewater to land is a discharge subject to NPDES permit requirements, except when applied in accordance with a site-specific NMP. 40 C.F.R. § 122.23(e). To the extent that Sonoma Horse Park uses process wastewater for land application such as dust control, it is violating this requirement because Sonoma Horse Park does not have an NMP. While Baykeeper staff did not witness Sonoma Horse Park applying process wastewater for dust control, they did see a tank truck that could be used for this purpose. Because it is a common practice at horse parks generally, such applications likely occur at Sonoma Horse Park.

Sonoma Horse Park further discharges pollutants that cause or contribute to violations of receiving Water Quality Standards. Baykeeper sampled stormwater runoff from Sonoma Horse Park and found high levels of bacteria (*see* Table 1, "Sampling Results," below).

Table 1. Sampling Results

Date	Time	Sample Type	Daily Precipitation (inches)	Sample Result: E. Coli (MPN/100 mL)	Exceedance (%) of E. Coli Standard (576 MPN/100 mL) *	Sample Result: Enterococci (MPN/100 mL)	Exceedance (%) of Enterococci Standard (151 MPN/100 mL) **
1/16/19	14:30	Upstream	1.83	12033	1989	6100	3940
1/16/19	14:55	Discharge	1.83	12033	1989	6100	3940
1/16/19	14:58	Intake	1.83	24196	4101	6900	4470
1/16/19	15:08	Discharge	1.83	4106	613	6500	4205
Field Blank (FB1)							
1/16/19	14:35	Upstream	1.83	Not Detected		Not Detected	

* E. Coli Maximum standards range from 235-576 MPN/100 mL. The standard used depends on the extent of recreational use.

The upper limit of the standard range (576 MPN/100 mL) was compared to the sampling results.

** Enterococci Maximum standards range from 61-151 MPN/100 mL, depending on the extent of recreational use and the inclusion of Total Coliform and Fecal Coliform standards. As with E. Coli, the upper limit of the standard range (151 MPN/100 mL) was compared to the sampling results.



Current water quality objectives list maximums for fresh and estuarine waters in San Francisco Bay at 104/100 mL for enterococci and 235-576/100 mL for e. coli.¹¹ Sample results came back from Sonoma Horse Park at 4106 for e. coli, over 600% of the limit, and 6500 for enterococci, over 6,000% of the limit.¹² The Petaluma River already exceeds water quality standards (*i.e.*, is impaired) for several pollutants known to be present at Sonoma Horse Park, including fecal bacteria (*i.e.*, e.coli and enterococci), nitrogen, and phosphorus. Unpermitted discharges from Sonoma Horse Park thus cause and contribute to the impairment of the Petaluma River in violation of the CWA.

4.4 Sonoma Horse Park Discharges Pollutants into Waters of the United States

Baykeeper's investigation has shown that Sonoma Horse Park has been and continues to discharge pollutants via process wastewater and stormwater to the Petaluma River. Pollutants include but are not limited to horse manure, bedding, sediment, equine footing, trash, and other pollutants associated with equine operations. During rain events, rain falls onto Sonoma Horse Park and runs through the stable and manure areas towards the Petaluma River. Stormwater comes into direct contact with manure and bedding from the stables. Water then flows from Sonoma Horse Park into the Petaluma River through man-made pipes, ditches, flushing systems, and a pump house. As this water empties into the river, it carries pollutants such as phosphorus, nitrogen, trash, and fecal bacteria.¹³

Sonoma Horse Park also most likely discharges pollutants in dry weather. Process wastewater from horse wash stations may escape the wash racks and the infiltration basin, with pollutants eventually ending up in the Petaluma River. Some wash racks are located no more than five feet from ditches and other conveyances that drain to the Petaluma River. Baykeeper also witnessed trash blowing into the river and adjacent riparian corridors. Baykeeper is informed and believes that there are various other discharges of pollutants not specifically mentioned herein for which Notice Recipients are liable. Each discharge of a pollutant into waters of the United States without a CAFO permit is a violation of Section 301 of the CWA, 33 U.S.C. § 1311.

¹¹ *Water Quality Control Plan for the San Francisco Bay Basin*.

https://www.waterboards.ca.gov/rwqcb2/water_issues/programs/planningtmdls/basinplan/web/docs/bp_ch3+tables.pdf (accessed on March 27, 2019).

¹² The California State Water Resources Control Board adopted the following, more stringent water quality standards, effective February 4, 2019 under state law, which will be applicable against Sonoma Horse Park under the Clean Water Act pending U.S. EPA approval: *Part 3 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California*

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2018/final_iswebe_bacteria_provision_s.pdf (accessed on March 27, 2019).

¹³ See, Attachment 5.



5. NOTICE RECIPIENTS' FAILURE TO OBTAIN STORMWATER PERMIT COVERAGE

In California, the owners and/or operators of any facility that discharges storm water associated with industrial activities, as defined in 40 C.F.R. section 122.26, to waters of the United States must first obtain coverage under the Stormwater Permit. Consequently, since Sonoma Horse Park is a large CAFO, the Notice Recipients must obtain coverage under the Stormwater Permit unless they are regulated by a separate individual or general NPDES permit. *See* 33 U.S.C. §§ 1311, 1342; 40 C.F.R. § 126.26(c)(1); Stormwater Permit, Discharge Prohibition A. The Stormwater Permit regulates industrial storm water discharges from specific categories of industrial facilities identified in Attachment A, which includes large CAFOs. Stormwater Permit, Attachment A.1; 40 C.F.R. Part 412.

Baykeeper is informed and believes, and thereon alleges that Sonoma Horse Park has not been enrolled under the Stormwater Permit by the Notice Recipients. Information available to Baykeeper indicates Sonoma Horse Park has illegally discharged storm water into waters of the United States during every measurable rain event since March 28, 2014. Sonoma Horse Park is required to obtain permit coverage for those portions of the site where these industrial activities are taking place. *See* 33 U.S.C. §§ 1311, 1342; 40 C.F.R. § 126.26(c)(1); Industrial Stormwater Permit, Discharge Prohibition A. Sonoma Horse Park has not been enrolled under the Industrial Stormwater Permit or any other CWA permit. Each discharge of pollutants from Sonoma Horse Park to waters of the United States without permit coverage, which occurs every time it rains, is a violation of section 301 of the Clean Water Act, 33 U.S.C. section 1311.

6. NOTICE RECIPIENTS' ACTIONS PRESENT AN IMMINENT AND SUBSTANTIAL ENDANGERMENT IN VIOLATION OF RCRA

Based on the foregoing facts, the Sonoma Horse Park Owners and Operators generate, transport, own, and/or operate a treatment, storage, and disposal facility that is contributing to the past and present storage and/or disposal of solid and hazardous wastes, namely horse manure, bedding, and related debris. These materials are "solid wastes" under RCRA. 42 U.S.C. § 6903(27) ("any...discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations . . ."). As documented by Baykeeper's investigation and sampling results, above, the Sonoma Horse Park Owners and Operators' practice of storing and disposing of liquid and solid manure, bedding, and related debris may present an imminent and substantial endangerment to the health of nearby residents, Baykeeper's members, and the environment. Sonoma Horse Park's past and present waste disposal practices have also caused contamination to travel beyond the Facility's boundaries, in violation of RCRA's open dumping prohibitions.



7. CONCLUSION

In addition to the violations set forth above, this Notice Letter covers all violations of the Clean Water Act and RCRA by the Notice Recipients as evidenced by information that becomes available to Baykeeper after the date of this Notice Letter. Specifically, Baykeeper puts the Notice Recipients on notice that it intends to include all violations of the CWA and RCRA in its federal citizen enforcement suit.

Pursuant to section 309(d) of the Clean Water Act, 33 U.S.C. section 1319(d), and the Adjustment of Civil Monetary Penalties for Inflation, 40 C.F.R. section 19.4 (1997), each separate violation of the Clean Water Act subjects the violator of a penalty of up to \$37,500.00 per day per violation for all Clean Water Act violations after January 12, 2009 and \$54,833.00 per day per violation for violations that occurred after November 2, 2015. In addition to civil penalties, Baykeeper will seek injunctive relief preventing further violations of the Clean Water Act pursuant to sections 505(a) and (d), 33 U.S.C. section 1365(a) and (d), and other such relief as is permitted by law. Section 505(d) of the Clean Water Act, 33 U.S.C. section 1365(d), permits prevailing parties to recover costs and fees. Finally, Baykeeper will seek injunctive relief for violations of RCRA section 7002, 42 U.S.C. section 6972, and will seek costs, attorney and expert witness fees.

Baykeeper has retained legal counsel to represent them in this matter. All communications concerning this notice should be addressed to:

Jason R. Flanders
Aqua Terra Aeris Law Group
490 43rd Street, Suite 108
Oakland, CA 94609
Phone: (916) 202-3018
Email: jrf@atalawgroup.com

Ben Eichenberg, Staff Attorney
San Francisco Baykeeper
1736 Franklin Street, Suite 800
Oakland, CA 94612
Phone: (510) 735-9700
Email: ben@baykeeper.org



Pursuant to notice requirements under 40 CFR section 135.3(1), Baykeeper discloses its contact information as follows:

San Francisco Baykeeper
c/o Ben Eichenberg, Staff Attorney
1736 Franklin Street, Suite 800
Oakland, CA 94612
Phone: (510) 735-9700

During the 60- and 90-day notice periods for violations of the CWA and RCRA, respectively, Baykeeper would like to discuss effective remedies with the Notice Recipients to address the violations noted in this Notice Letter. If the Notice Recipients wish to pursue such discussions, we suggest that it initiate those discussions immediately. At the close of the respective 60- and 90-day notice periods, if a complete and comprehensive solution is not provided, Baykeeper intends to move forward with litigation to prevent ongoing violations of the CWA and the RCRA.

Baykeeper further intends to file its initial complaint at the end of the notice period for this Notice Letter, sent on March 28, 2019, for the claims noticed herein barring a settlement prior to that date.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jason R. Flanders", written over a horizontal line.

Jason R. Flanders
Aqua Terra Aeris Law Group
On behalf of San Francisco Baykeeper



SERVICE LIST

VIA CERTIFIED MAIL

Andrew R. Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

William Barr
U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-001

Eileen Sobeck
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Mike Stoker
Acting Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Thomas Mumley
Acting Executive Officer
Regional Water Quality Control Board
San Francisco Bay
1515 Clay Street,
Oakland, California 94612

Scott Smithline
Director
California Department of Resources Recycling
and Recovery
1001 I Street,
Sacramento, CA 95814

ATTACHMENT 1

Sonoma County Clerk's Office
585 Fiscal Dr., Room 103
Santa Rosa, CA 95403

FICTITIOUS BUSINESS NAME STATEMENT

FILING FEE

\$40.00 for first business name and first owner on statement
\$ 9.00 for each additional business name filed on same
statement and doing business at the same location
\$ 9.00 for each additional owner



FILED

County of Sonoma
William F. Rousseau
County Clerk, Recorder, Assessor

201703222

10/02/2017 Exp: 10/02/2022
Original



By: *Adm*

Deputy Clerk

THE FOLLOWING PERSON (PERSONS) IS (ARE) DOING BUSINESS AS: (Please Print or Type)

* Fictitious Business Name (please number if more than one business name)

1. *Riverside Equestrian Center*

** Street address of principal place of business

7600 Lakeville Hwy

Mailing Address, if different

City *Petaluma* State *CA* Zip *94954* County *Sonoma*

***REGISTERED OWNER(S): (If more than four owners, attach additional sheet showing owner information)

1.

Full Name

SONOMA HORSE PARK

Residence Address

7600 Lakeville Hwy

City

Petaluma CA 94954

If Corporation or LLC - Print State of Incorporation/Organization

2.

Full Name

Residence Address

City

State Zip

If Corporation or LLC - Print State of Incorporation/Organization

3.

Full Name

Residence Address

City

State Zip

If Corporation or LLC - Print State of Incorporation/Organization

4.

Full Name

Residence Address

City

State Zip

If Corporation or LLC - Print State of Incorporation/Organization

****THIS BUSINESS IS CONDUCTED BY: (Check one) [1 requires registration with the CA Secretary of State]

☐ An Individual

☐ A General Partnership

☐ A Limited Partnership 1

☐ A Limited Liability Company 1

☐ An Unincorporated Association other than a Partnership

☒ A Corporation 1

☐ A Trust ☐ Copartners

☐ Married Couple

☐ Joint Venture

☐ State or Local Registered Domestic Partners

☐ Limited Liability Partnership

*****The registrant commenced to transact business under the fictitious business name or names listed above on

1997

(Insert N/A if you haven't started to transact business)

I declare that all information in this statement is true and correct.

A registrant who declares as true any material matter pursuant to this section that the registrant knows to be false is guilty of a misdemeanor punishable by a fine not to exceed one thousand dollars (\$1,000).

Signature of Registrant

Howard Herman

Printed Name and Title

HOWARD HERMAN, President

(Printed Name and Title of Person Signing - See instructions for authorized signatories/titles)

This statement was filed with the County Clerk-Recorder of Sonoma County on the date indicated by the filing stamp in the upper right hand corner.

NOTICE: IN ACCORDANCE WITH SUBDIVISION (A) OF SECTION 17920, A FICTITIOUS BUSINESS NAME STATEMENT GENERALLY EXPIRES AT THE END OF FIVE YEARS FROM THE DATE ON WHICH IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK-RECORDER, EXCEPT, AS PROVIDED IN SUBDIVISION (B) OF SECTION 17920, WHERE IT EXPIRES 40 DAYS AFTER ANY CHANGES IN THE FACTS SET FORTH IN THE STATEMENT PURSUANT TO SECTION 17913 OTHER THAN A CHANGE IN THE RESIDENCE ADDRESS OF A REGISTERED OWNER. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED BEFORE THE EXPIRATION.

THE FILING OF THE STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14411 ET SEQ., BUSINESS AND PROFESSIONS CODE).

I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE.

William F. Rousseau, Sonoma County Clerk-Recorder

By: _____

, Deputy

ATTACHMENT 2

SONOMA HORSE PARK 2019 RULES & GENERAL INFORMATION

1. "Every class offered herein which is covered by the rules and specifications of the current USEF Book will be conducted and judged in accordance therewith."

2. Life, senior active and junior active members shall be eligible to participate in all classes at Regular Competitions, Eventing Competitions at the Preliminary Level or above & Combined Driving Competitions at Advanced Level, Dressage, Reining and Vaulting Competitions and Endurance Rides. A nonmember may participate as a handler, rider, driver, owner, lessee, agent, coach or trainer at Regular Competitions, Eventing Competitions, Dressage Competitions, Reining Competitions and Combined Driving Competitions upon payment of a \$30 Show Pass fee. Participants in the following classes are exempted from the Requirements of this rule: 1) Leadline; 2) Exhibitions; 3) Games and races; 4) Classes for 4-H members; 5) Walk trot and academy classes (academy classes are classes limited to horses used regularly in a lesson program); 6) USDF introductory level tests, pas de deux and quadrille classes; 7) NRHA Endorsed Reining Competitions. 8) Opportunity classes, 9) Citizens of other nations who have proof, in English, of current membership in good standing of their own National Federation, 10) USEA beginner novice division; 11) Assistant handlers in Dressage Sport Horse Breeding classes. See GR901.

3. RELEASES - FEDERATION ENTRY AGREEMENT: By entering a Federation-licensed Competition and signing this entry blank as the Owner, Lessee, Trainer, Manager, Agent, Coach, Driver, Rider, Handler, Vaultor or Longeur and on behalf of myself and my principals, representatives, employees and agents, I agree that I am subject to the Bylaws and Rules of the United States Equestrian Federation, Inc. (the "Federation") and the local rules of the competition. I agree to be bound by the Bylaws and Rules of the Federation and of the competition. I will accept as final the decision of the Hearing Committee on any question arising under the Rules, and agree to release and hold harmless the competition, the Federation, their officials, directors and employees for any action taken under the Rules. I represent that I am eligible to enter and/or participate under the Rules, and every horse I am entering is eligible as entered. I agree that as a condition of and in consideration of acceptance of entry, the Federation and/or the Competition may use or assign photographs, videos, audios, cable-casts, broadcasts, internet, film, new media or other likenesses of me and my horse from the competition for the promotion, coverage or benefit of the competition, sport, or the Federation. Those likenesses shall not be used to advertise a product and may not be used in such a way as to jeopardize amateur status. I hereby expressly and irrevocably waive and release any rights in connection with such use, including any claim to compensation, invasion of privacy, right of publicity, or to misappropriation. The construction and application of Federation rules are governed by the laws of the State of New York, and any action instituted against the Federation must be filed in NY State. See GR908.4.

SONOMA HORSE PARK: I HEREBY EXPRESSLY, VOLUNTARILY, AND UNCONDITIONALLY RELEASE, INDEMNIFY AND HOLD HARMLESS Howard Herman, Marcia Herman, Meredith Herman, Ashley Herman, Burgundy Farms, Riverside Equestrian Center, Sonoma Horse Park, Sally Hudson and/or Headlands Management, Inc., their owners, officers, members, agents, employees, licensees and invitees, as well as any other person, firm, corporation, company, entity, or anyone in any way connected with the ownership and management of the show premises and the Horse Show, or in control of the premises or equipment related thereto (collectively, "Releasees") from and against ANY AND ALL CLAIMS FOR INJURIES, DAMAGES, AND/OR LOSSES connected with participation in this Horse Show. This includes, but is not limited to, claims for monetary damages, attorney's fees, costs, losses, and/or causes of action against Releasees for any and all Harm to me or my horse(s) and for any Harm caused or contributed in any way to by me or my horse(s) to others, arising out of or in any way connected with participation in this Horse Show, and includes reimbursement of Releasees' costs and attorney's fees incurred in defense of such claims. I further agree to this release, indemnification, and holding harmless WHETHER OR NOT SUCH CLAIM, INJURY, DAMAGE, OR LOSS RESULTED, DIRECTLY OR INDIRECTLY, FROM MY NEGLIGENT ACTS OR OMISSIONS OR THE NEGLIGENT ACTS OR OMISSIONS OF RELEASEES, to the fullest extent allowed by law. I also acknowledge that no representations or warranties, whether oral or written, implied or expressed, have been made by Releasees concerning Horse Show premises, the Horse Show event, or activities at Burgundy Farms, Riverside Equestrian Center, and/or Sonoma Horse Park, or any other matter.

PCHA: The competition and its management agree to defend, indemnify and hold harmless the PCHA, its directors, officer, committee members, agents and employees from and against all loss or damage including any and all claims arising out of the competition, including claims as to personal injury or property loss or damage suffered during or in conjunction with competition, whether or not such injury or loss resulted directly or indirectly from negligent acts or omissions of said directors, officers, committee members, agents or employees.

4. MANAGEMENT: The Horse Show Manager reserves the right to itself to interpret all questions and conditions in regard to, or arising out of, or incident to the show without claims for damages or recourse of any kind. All questions not covered in these Rules & Regulations shall be decided by the horse show manager; its decision to be final.

5. RESPONSIBILITY: Horse Show Manager reserves to itself the right to refuse, accept conditionally, or to cancel any entries, disqualify any riders or exhibitors, prohibit exhibition of entries, and cancel award prizes, without claim for damages; to change any course, to cancel or combine any unfilled classes, or to reschedule classes as competition warrants.

6. STALL REQUEST: Trainers will be responsible for payment of all stalls requested. Check or Credit Card required to hold stalls. If stall request are taken, they will only be held until the close of entries.

7. **CONDITION OF ENTRY:** Every horse entered herein for competition will be under the control of the Horse Show Manager, but the horse show manager will in no case be responsible for any loss or damage that may occur, and it shall be a condition of entry that each exhibitor shall hold the individual horse shows and the officials, employees, directors, officers, sponsoring entities, Sonoma Horse Park, Riverside Equestrian Center, Giant Steps, Headlands Management, Inc. and its employees, directors, officers, sponsoring entities of each horse show & the facilities at which each horse show is held blameless for any loss or accident to his horse(s), employee(s), or equipment which may occur from sickness, fire or other cause. All owners and exhibitors shall be responsible for any damage incurred by them, their agents or employees to stalls, buildings, and other properties on the show grounds, and shall be billed accordingly.

8. **ENTRY PROCEDURES:** Entry blanks must be filled out completely, including all classes entered, signatures and organizational membership numbers. Horses entered without classes may be put on a waiting list for classes if rings are fully subscribed. Entry blanks must be postmarked or submitted electronically (showgroundslive.com/headlands or equestrianconnect.com) on or before the closing date of entries. Any entry postmarked or entered online after the closing date of entries may be charged a late fee. Late fee is \$50. For each horse entered, send in the \$100 nominating fee and all stall fees (if a stall is needed). GR907.1 STALLS AND CLASSES MAY BECOME FULLY SUBSCRIBED BEFORE THE CLOSE OF ENTRIES.

9. **NOMINATING FEE:** The Nominating fee will not be deducted from entry fees. Classes scratched in horse show office on official add/scratch forms before the start of the class will receive a full refund. Scratch fees will still apply.

10. **POST ENTRIES/SCRATCH FEES:** Any entry postmarked after close of entries is considered a post entry and will pay a \$50 late fee as penalty. Classes may be added up until 4:00 pm the day prior to the day of the class. A full class fee refund will be given to all classes scratched prior to start of the class (exception - Special classes. See Rules 34 & 35). Horse Show Management reserves the right to limit entries at its discretion.

11. **ENTRY BLANKS:** Please enter each horse in its proper division or class. Exhibitors are responsible for their errors and those of their agents in making out entry blanks. In all cases the description on entry blank must fully identify the horse. The word "entry" shall not be accepted.

- A. Be properly signed, and in the case of a minor, be signed by a parent or guardian.
- B. Be made on an entry blank provided by the show.
- C. Show the correct mailing address of the owner.
- D. Social Security number must be included on entry blank.
- E. Include copy of USEF membership card for each owner, lessee, agent, trainer, coach, rider & handler.
- F. Include copy of USHJA membership card for each owner, lessee, agent, trainer, coach, rider & handler.
- G. Include all additional membership numbers and birth dates of junior and amateur riders. Attach photocopy of USEF amateur card.
- H. Attach photocopy of USEF pony measurement card for any ponies entered in the Pony Hunters, Children's Pony Hunters, Pony Equitation and Pony Jumpers division. See rule 28.
- I. Attach photocopy of USEF measurement card for any Junior Hunter entered in hunter division. See rule 28.
- J. Payment for Nomination Fee and Stall Fee per horse must be included.
- K. Credit card number, expiration date and signature must be included on the credit card form.

12. **REFUNDS:** All refund requests must be submitted in writing. Before close of entries, all fees will be refunded. After close of entries, no refunds given unless one of the following requirements is met:

- Prior to start of show, entry fees will be refunded less the stall fee and office fee.
- After show starts, classes scratched in Horse Show Office before class has started will be refunded.
- After show starts, add and scratch fees for Classics, Grand Prix, Stakes & Special Classes will apply.

13. **RETURNED CHECKS:** Checks returned by the bank for any reason are regarded as a serious offense and will be handled in the following procedure. \$50 or 10% of the amount of the check will be assessed for each returned check. Accounts will be given 10 days to be paid in full with cash or cash equivalent, or they will be turned into USEF and PCHA for further disciplinary action. Credit Cards declined and charge-backs will be handled as above.

14. **UNPAID CHARGES:** If show management or official (i.e. farrier, veterinarian, feed supplier, photographer, food concessionaire, etc.) must bill an exhibitor for unpaid charges, a \$50 billing fee will be added to amount due.

15. **COURSES:** Courses may consist of any combination of the following: Brush, Gates, Oxers, Panels, Post and Rails, Banks, Ditches, Coups, and Liverpools. The horse show management reserves the right to adjust fence heights and/or spreads in jumper classes as competition warrants.

16. **NUMBERS:** Management will provide a number card for each competitor which shall be worn on the rider's back clearly visible to the judge at all times when in competition. Riders wearing the wrong number or no number at all may be eliminated from the class by the judge.

17. PRIZE MONEY: Prize money not deducted from the statement will be made payable to owner listed on entry blank and mailed within 30 days after the show. PRIZE MONEY WILL NOT BE MAILED UNLESS THE OWNER'S SOCIAL SECURITY NUMBER IS LISTED ON ENTRY BLANK. ANYONE REQUESTING 1099 CHANGES AFTER THEY HAVE BEEN MAILED WILL BE CHARGED \$100 TO BE PAID IN ADVANCE. PRIZE MONEY CHECKS NOT CASHED AFTER 90 DAYS WILL HAVE A STOP PAYMENT PLACED ON THEM AND EXHIBITOR WILL FORFEIT PRIZE MONEY. PRIZE MONEY WON BY FOREIGN EXHIBITORS: Foreign exhibitors are advised that the U.S. Internal Revenue Service requires sporting events to withhold 30% of prize money won in the United States. Foreign exhibitors should apply for a U.S. Social Security number and will be asked to complete form W-8 prior to the Headlands Management, Inc. Horse Shows issuing prize money won.

18. ADD-BACK: In classes with add-back, prize money is computed from the number of horses that actually show.

19. ARRIVAL & DEPARTURE: Horses and grooms may arrive & depart within the days listed below:

SHP SPRING CLASSIC • MAY 8 - 12, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Sunday, 8:00 AM May 5, 2019
Departure by 7:00 PM Sunday, May 12, 2019

HMI EQUESTRIAN CHALLENGE • MAY 15 - 19, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Monday, 12:00 PM May 13, 2019
Departure by 7:00 PM Sunday, May 19, 2019

HMI JUNE CLASSIC • JUNE 12 - 16, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Sunday, 8:00 AM June 9, 2019
Departure by 7:00 PM Sunday, June 16, 2019

HMI EQUESTRIAN CLASSIC • JULY 24 - 28, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Sunday, 8:00 AM July 21, 2019
Departure by 7:00 PM Sunday, July 28, 2019

GIANT STEPS CHARITY CLASSIC • JULY 30 - AUGUST 4, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Monday, 12:00 PM July 29, 2019
Departure by 7:00 PM Sunday, August 4, 2019

SPLIT ROCK JUMPING TOUR SONOMA INTERNATIONAL CSI2* • SEPTEMBER 4 - 8, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Sunday, 8:00 AM September 1, 2019
Departure by 7:00 PM Sunday, September 8, 2019

STRIDES & TIDES • SEPTEMBER 11 - 15, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Monday, 8:00 AM September 9, 2019
Departure by 7:00 PM Sunday, September 15, 2019

SHP SEASON FINALE • SEPTEMBER 18 - 22, 2019

Arrivals can be accommodated ONLY between the hours of 8 AM and 6
PM. Arrive no earlier than Monday, 12:00 PM September 16, 2019
Departure by 7:00 PM Sunday, September 22, 2019

20. **PARKING:** Horse trailers will be parked in designated areas. Autos will also be parked in designated areas. No autos allowed in the barn aisles.

21. **LIMITED RV SPACE:** RV parking is available at \$375 per RV per show. Includes 20 amps of electricity, water and two pump-out services. If available, 50 amp spaces will be available for an additional \$150 per show. There are limited spaces available. RVs must park in designated area with a dated permit provided by the show. Permit must be visibly placed in windshield. RVs will be pumped on Thursday and Saturday Evenings. Reservations will be taken on a paid first come-first served basis.

22. **GOLF CARTS:** Minors without a valid driver's license allowing them to operate a motorized vehicle in the state in which they reside are not permitted to operate a motorized vehicle of any kind, including, but not limited to, golf carts, motorcycles, scooters, or farm utility vehicles at Sonoma Horse Park. Minors who have a valid temporary license may operate the above listed motorized vehicles as long as they are accompanied by an adult with a valid driver's license. The parent(s), legal guardian(s), or individual who signs the entry blank as a parent or guardian of a minor operating a motorized vehicle in violation of this rule are solely responsible for any damages, claims, losses or actions resulting from that operation. Violations of this rule will be cause for sanctions against the parent(s), guardian(s) and/or trainer(s) who are responsible for the child committing the offense. Penalties may include exclusion of the child, parent(s), guardian(s), and/or trainer(s) from Sonoma Horse Park for the remainder of competition and charges being filed against any of above individuals in accordance with Chapter 6. Wheelchairs and other mobility assistance devices for individuals with disabilities are exempt from this rule. USEF GR1301.7

23. **STABLING:** Requests for stalls for horses not entered in the show or for tack, feed or grooming may be reduced by management and refunds given, if there is a shortage of stalls. No straw allowed.

24. **STALLS:** Exhibitors are responsible for the condition of the stalls upon departure. Anyone dismantling stalls or causing damage to a stall will be charged a \$100 fee per panel, with a maximum fine per stall of \$400. 10' x 10' stalls are wood or canvas with top and bottom doors. 10' x 12' stalls are 1/4 inch puck board with a single door.

25. **FEED & BEDDING:** All feed orders received in Horse Show Office by NOON will be delivered the same day. Saturday feed orders must be in by NOON. No deliveries on Sunday. All feed orders must state barn and stall numbers. Feed and bedding will not be delivered without a signed open check or credit card number on file at the Horse Show Office.

26. **MEDICAL WASTE:** Needles must be placed in proper receptacles. Anyone found in violation will be subject to \$100 fine or other penalties deemed necessary by show management. USEF GR1210.4

27. **HARD HATS AND ATTIRE:** USEF GR801 will be strictly enforced. It is compulsory for all persons at Federation licensed hunter, jumper or hunter/jumper competitions when mounted anywhere on the competition grounds, to wear properly fastened protective headgear which meets or exceeds ASTM (American Society for Testing and Materials)/SEI (Safety Equipment Institute) standards for equestrian use and carries the SEI tag. It must be properly fitted with harness secured. GR801.2 All exhibitors are required to wear shoes or boots with a riding heel whenever mounted on horseback on the grounds. GR801.9

28. **MEASURING OF ENTRIES:** Time of measuring will be posted in Horse Show Office. All hunter and jumper ponies and junior hunters must have a copy of, or the original measurement cards presented to a show secretary or be measured if card is not available, before the exhibitors' number will be released.

29. **SCHOOLING SUPERVISION:** Please note: paddock stewards are schooling supervisors & have absolute authority to scratch riders who do not follow USEF schooling rules. They can scratch riders without going through the USEF Steward or the Horse Show Manager.

30. **DOGS:** Dogs are not permitted to be loose on competition grounds and must be on a leash or contained. Individuals may not lead dogs on a leash while mounted. Dog owners are solely responsible for any damages, claims, losses or actions resulting from dogs' behaviors. Dog owners failing to comply with this rule may be subject to penalty under Chapters 6 and 7 and issuance of warning cards. See USEF GR1301.6. Loose dogs will be detained until owner has paid a \$25 fine. A second offense may cause owner to be barred from showing and expelled from show grounds. Refusal to pay fine will bar owner from further participation in horse show and owner will not be entitled to any refund of entry or stabling fees paid or due. Management reserves the right to call Animal Control to have an animal removed from the premises.

31. **TIME SCHEDULE/POSTED ORDER:** Each evening, time schedule for the next day's schedule is available. This time schedule will be strictly adhered to. Trainer, exhibitor or representative must tell the paddock steward of possible ring conflicts so arrangements can be made to accommodate the rider and time schedule. All Hunter and Jumper orders will be drawn according to USEF Rule JP112. Posted orders for Grand Prix, Hunter and Jumper Classics, Hunter and Jumper Derbies will be strictly adhered to. All Horse Show Manager decisions will be final.

32. **LUNGING:** Lunging is NOT permitted in the following arenas: Grand Prix Arena, Grand Prix Warm-Up Arena, Jumper 2 Arena, Main Hunter Arena, Hunter 2 Arena, Hunter 3 Arena and Hunter 4 Arena. The trainer will be fined \$500 each time anyone is caught lunging in any of these arenas. The \$500 penalty fee will be added to trainer's show bill and is expected to be paid upon check out.

33. ARENAS: Grand Prix Arena, Grand Prix Warm-up Arena, Jumper 2 Arena, Main Hunter Arena, Hunter 2 Arena and Hunter 3 Arena are sand and CLOPF® Fiber. All other arenas are sand footing. Grand Prix Arena: 350' X 210', Jumper 2 Arena: 300' X 160', Main Hunter Arena: 275' X 165', Hunter 2 Arena: 260' X 160', Hunter 3 Arena: 240' X 140'.

34. Jumper Grand Prix & Classics: Grand Prix: Horses must declare by 1:00 PM the day before the Grand Prix, Derby & Classics are scheduled to be held. A late fee will be charged if entered after 1:00 PM the day before class is held. A \$100 scratch fee will be charged if the Grand Prix and/or Derby are scratched the day class is held. Classics scratched the day of Classic will pay either \$100 or \$50 scratch fee (see class list for classic penalty fee).

35. Hunter Classics: Horses entered the day of Classic will pay a late fee. To be eligible, horses must have entered, shown and completed the course in at least 2 classes in the Hunter section. Classics scratched day of the Classic will pay either \$100 or \$50 scratch fee (see class list for classic penalty fee). Horses not qualified for second classic round, when the first round is the last class of division, will pay a \$50 scratch fee.

36. Directions to Sonoma Horse Park:

- 101 North: From San Francisco/Marin: Exit CA-37 toward Napa/Vallejo (5.7 miles). Turn left at Lakeville Road (2 miles). 7600 Lakeville Hwy is on the left.
- 101 South: From Santa Rosa: Exit CA-116 East toward Napa/Sonoma (.2 miles). Turn left at Lakeville Hwy (9 miles). 7600 Lakeville Hwy is on the right.
- I-80: Sacramento/East Bay: Exit CA-37 toward Napa (16.3 miles). Turn right at Lakeville Hwy (2 miles). 7600 Lakeville Hwy is on the left.

37. Mailing Address: UPS & FedEx shipments: Sonoma Horse Park, 7600 Lakeville Hwy, Petaluma, CA 94954. Attention: Horse Show Office

HORSE SHOW CHAMPIONSHIPS

1.30 Meter Open Jumpers	Pre-Children's Jumpers	USHJA 2'6 Hunters	Low Adult Amateur Hunters
1.20 Meter Open Jumpers	Pre-Adult Amateur Jumpers	USHJA 2'3 Hunters	Modified Children's Hunters
1.10 Meter Open Jumpers	Child/Adult Amateur Jumpers	USHJA 2' Hunters	Modified Adult Amateur Hunters
1.00 Meter Open Jumpers	Pony Jumpers	Large Junior Hunters 3'6	Small Pony Hunters
.90 Meter Open Jumpers	High Performance Working Hunters 3'9	Small Junior Hunters 3'6	Medium Pony Hunters
.80 Meter Open Jumpers	Green Hunters 3'9	Large Junior Hunters 3'3	Large Pony Hunters
1.30 Meter 7 Year Old	Green Hunters 3'6	Small Junior Hunters 3'3	Sm/Med Green Pony Hunters
1.20 Meter 6 Year Old	High Performance Confirmation Hunters 3'9	AO Hunters 18 - 35 3'6	Large Green Pony Hunters
1.00 Meter 5 Year Old	Green Confirmation Hunters 3'6	AO Hunters 36 & Over 3'6	Sm/Med Child Pony Hunters
1.40 Meter JR/AO Jumpers	Performance Hunters 3'6	AO Hunters 18 - 35 3'3	Large Child Pony Hunters
1.30 Meter JR/AO Jumpers	Performance Hunters 3'3	AO Hunters 36 & Over 3'3	Equitation 36 & Over
JR/AM Modified Jumpers	Green Hunters 3'3	Junior Modified Hunters	Equitation 18 - 35
Children's Jumpers	Green Hunters 3'	Amateur Modified Hunters	Equitation 15 - 17
Adult Amateur Jumpers	Young Hunters 7 & Under	Children's Hunters 13 & Under	Equitation 14 & Under
Low Children's Jumpers	Young Hunters 6 & Under	Children's Hunters 14 - 17	Beginning Equitation 18 & Over
Low Adult Amateur Jumpers	Young Hunters 5 & Under	Adult Amateur Hunters 18 - 35	Beginning Equitation 17 & Under
Modified Children's Jumpers	USHJA 3' Hunters	Adult Amateur Hunters 36 & Over	Equitation Pony
Modified Adult Amateur Jumpers	USHJA 2'9 Hunters	Low Children's Hunters	

FRIENDSHIP SERIES CHAMPIONSHIPS

Canter Cross Rail Hunters	Short Stirrup Hunters 10 & Under	Short Stirrup Hunters 11 - 17	Long Stirrup Hunters
Canter Cross Rail Equitation	Short Stirrup Equitation 10 & Under	Short Stirrup Equitation 11 - 17	Long Stirrup Equitation
Walk Trot			

AWARDS & POINTS

PRIZE MONEY

1st: 30% 2nd: 22% 3rd: 15% 4th: 10% 5th: 7% 6th: 6% 7th: 5% 8th: 5%

CLASSICS

Trophy to 1st place. Ribbons to 10th place

CLASSES

Trophy to 1st place. Ribbons to 8th place

POINTS

1st: 10 2nd: 6 3rd: 4 4th: 2 5th: 1 6th: .5

MODEL

1st: 5 2nd: 3 3rd: 2 4th: 1 5th: .5 6th: .25

BONUS POINTS *See list of Open Jumpers Classes

1st: 15 2nd: 9 3rd: 6 4th: 3 5th: 2 6th: 1

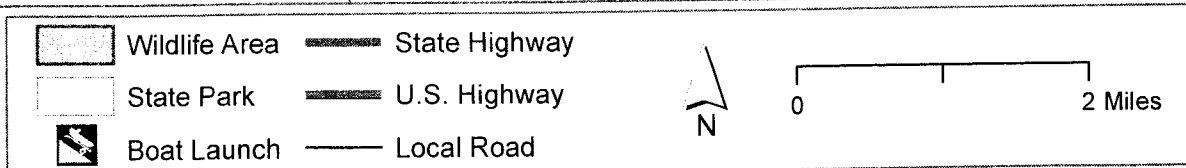
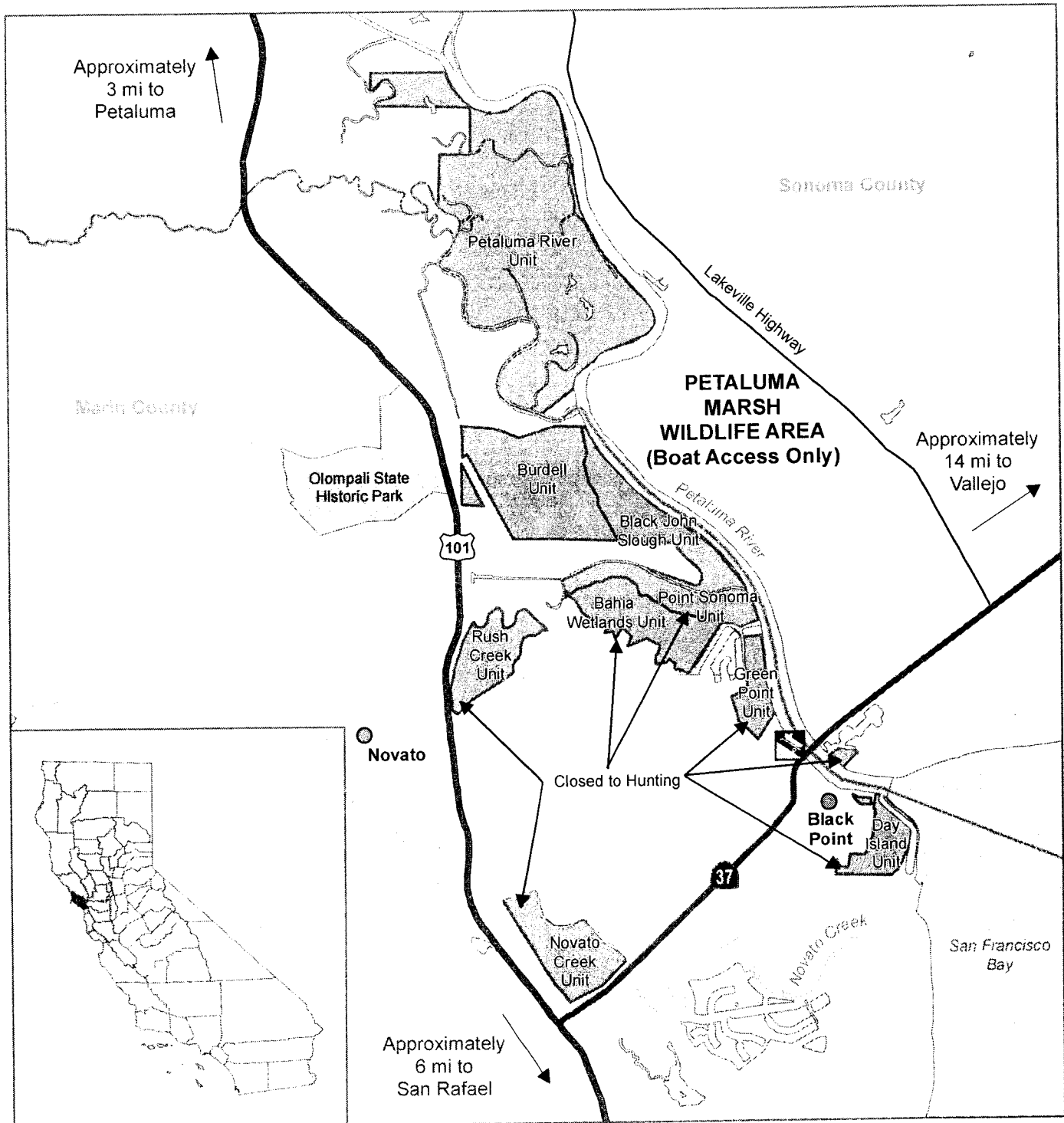
ATTACHMENT 3

California Department of Fish and Wildlife

Bay Delta Region

PETALUMA MARSH WILDLIFE AREA

Marin County



Disclaimer: Boundaries are approximate.
Maps are intended for general purposes only.

January 2015 - WLB

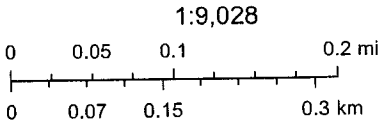
ATTACHMENT 4

Permit Sonoma: Zoning & Land Use



9/20/2018, 10:17:55 AM

Parcels Riparian Corridor RC 100' 50'



Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user

Permit Sonoma
Esri, HERE, Garmin, IPC | USDA FSA |

ATTACHMENT 5

Rain Data from Petaluma Airport
3/26/2014 to 3/17/2019

STATION	NAME	DATE	INCHES
USC00046826	PETALUMA AIRPORT, CA US	3/26/2014	0.64
USC00046826	PETALUMA AIRPORT, CA US	3/29/2014	0.65
USC00046826	PETALUMA AIRPORT, CA US	3/31/2014	0.62
USC00046826	PETALUMA AIRPORT, CA US	4/1/2014	0.48
USC00046826	PETALUMA AIRPORT, CA US	4/2/2014	0.17
USC00046826	PETALUMA AIRPORT, CA US	4/4/2014	0.41
USC00046826	PETALUMA AIRPORT, CA US	4/25/2014	0.37
USC00046826	PETALUMA AIRPORT, CA US	4/26/2014	0.15
USC00046826	PETALUMA AIRPORT, CA US	9/18/2014	0.14
USC00046826	PETALUMA AIRPORT, CA US	9/25/2014	0.24
USC00046826	PETALUMA AIRPORT, CA US	10/25/2014	0.19
USC00046826	PETALUMA AIRPORT, CA US	10/31/2014	0.31
USC00046826	PETALUMA AIRPORT, CA US	11/13/2014	0.24
USC00046826	PETALUMA AIRPORT, CA US	11/19/2014	0.31
USC00046826	PETALUMA AIRPORT, CA US	11/20/2014	0.63
USC00046826	PETALUMA AIRPORT, CA US	11/21/2014	0.1
USC00046826	PETALUMA AIRPORT, CA US	11/22/2014	0.47
USC00046826	PETALUMA AIRPORT, CA US	11/28/2014	0.85
USC00046826	PETALUMA AIRPORT, CA US	11/29/2014	0.65
USC00046826	PETALUMA AIRPORT, CA US	12/2/2014	1.01
USC00046826	PETALUMA AIRPORT, CA US	12/3/2014	3.85
USC00046826	PETALUMA AIRPORT, CA US	12/4/2014	0.21
USC00046826	PETALUMA AIRPORT, CA US	12/5/2014	0.13
USC00046826	PETALUMA AIRPORT, CA US	12/6/2014	0.56
USC00046826	PETALUMA AIRPORT, CA US	12/11/2014	4.04
USC00046826	PETALUMA AIRPORT, CA US	12/12/2014	1.48
USC00046826	PETALUMA AIRPORT, CA US	12/15/2014	1.7
USC00046826	PETALUMA AIRPORT, CA US	12/16/2014	0.68
USC00046826	PETALUMA AIRPORT, CA US	12/17/2014	0.67
USC00046826	PETALUMA AIRPORT, CA US	12/18/2014	0.18
USC00046826	PETALUMA AIRPORT, CA US	12/19/2014	0.82
USC00046826	PETALUMA AIRPORT, CA US	2/6/2015	1.18
USC00046826	PETALUMA AIRPORT, CA US	2/7/2015	0.45
USC00046826	PETALUMA AIRPORT, CA US	2/8/2015	1.05
USC00046826	PETALUMA AIRPORT, CA US	2/9/2015	0.18
USC00046826	PETALUMA AIRPORT, CA US	4/6/2015	0.67
USC00046826	PETALUMA AIRPORT, CA US	4/25/2015	0.6
USC00046826	PETALUMA AIRPORT, CA US	5/14/2015	0.37
USC00046826	PETALUMA AIRPORT, CA US	6/10/2015	0.24
USC00046826	PETALUMA AIRPORT, CA US	11/2/2015	0.48
USC00046826	PETALUMA AIRPORT, CA US	11/9/2015	0.12
USC00046826	PETALUMA AIRPORT, CA US	11/15/2015	0.45
USC00046826	PETALUMA AIRPORT, CA US	11/24/2015	0.85
USC00046826	PETALUMA AIRPORT, CA US	12/3/2015	0.53
USC00046826	PETALUMA AIRPORT, CA US	12/5/2015	0.16
USC00046826	PETALUMA AIRPORT, CA US	12/9/2015	0.18

Rain Data from Petaluma Airport
3/26/2014 to 3/17/2019

USC00046826	PETALUMA AIRPORT, CA US	12/10/2015	0.35
USC00046826	PETALUMA AIRPORT, CA US	12/12/2015	0.36
USC00046826	PETALUMA AIRPORT, CA US	12/13/2015	0.5
USC00046826	PETALUMA AIRPORT, CA US	12/20/2015	0.92
USC00046826	PETALUMA AIRPORT, CA US	12/21/2015	1.43
USC00046826	PETALUMA AIRPORT, CA US	12/22/2015	0.29
USC00046826	PETALUMA AIRPORT, CA US	12/24/2015	0.25
USC00046826	PETALUMA AIRPORT, CA US	1/4/2016	0.12
USC00046826	PETALUMA AIRPORT, CA US	1/5/2016	1.43
USC00046826	PETALUMA AIRPORT, CA US	1/6/2016	0.95
USC00046826	PETALUMA AIRPORT, CA US	1/12/2016	0.65
USC00046826	PETALUMA AIRPORT, CA US	1/13/2016	0.3
USC00046826	PETALUMA AIRPORT, CA US	1/16/2016	0.55
USC00046826	PETALUMA AIRPORT, CA US	1/17/2016	0.15
USC00046826	PETALUMA AIRPORT, CA US	1/18/2016	0.78
USC00046826	PETALUMA AIRPORT, CA US	1/19/2016	0.88
USC00046826	PETALUMA AIRPORT, CA US	1/22/2016	0.18
USC00046826	PETALUMA AIRPORT, CA US	1/23/2016	0.24
USC00046826	PETALUMA AIRPORT, CA US	1/29/2016	0.48
USC00046826	PETALUMA AIRPORT, CA US	2/18/2016	0.51
USC00046826	PETALUMA AIRPORT, CA US	2/19/2016	0.25
USC00046826	PETALUMA AIRPORT, CA US	3/4/2016	0.1
USC00046826	PETALUMA AIRPORT, CA US	3/5/2016	0.37
USC00046826	PETALUMA AIRPORT, CA US	3/6/2016	1.55
USC00046826	PETALUMA AIRPORT, CA US	3/7/2016	0.65
USC00046826	PETALUMA AIRPORT, CA US	3/9/2016	0.13
USC00046826	PETALUMA AIRPORT, CA US	3/10/2016	1.38
USC00046826	PETALUMA AIRPORT, CA US	3/11/2016	1
USC00046826	PETALUMA AIRPORT, CA US	3/12/2016	0.29
USC00046826	PETALUMA AIRPORT, CA US	3/13/2016	0.45
USC00046826	PETALUMA AIRPORT, CA US	3/14/2016	0.28
USC00046826	PETALUMA AIRPORT, CA US	3/20/2016	0.19
USC00046826	PETALUMA AIRPORT, CA US	3/21/2016	0.22
USC00046826	PETALUMA AIRPORT, CA US	4/9/2016	0.47
USC00046826	PETALUMA AIRPORT, CA US	4/10/2016	0.13
USC00046826	PETALUMA AIRPORT, CA US	4/22/2016	0.33
USC00046826	PETALUMA AIRPORT, CA US	5/7/2016	0.1
USC00046826	PETALUMA AIRPORT, CA US	5/8/2016	0.17
USC00046826	PETALUMA AIRPORT, CA US	10/3/2016	0.66
USC00046826	PETALUMA AIRPORT, CA US	10/14/2016	0.28
USC00046826	PETALUMA AIRPORT, CA US	10/15/2016	0.3
USC00046826	PETALUMA AIRPORT, CA US	10/16/2016	0.72
USC00046826	PETALUMA AIRPORT, CA US	10/25/2016	1.37
USC00046826	PETALUMA AIRPORT, CA US	10/27/2016	0.11
USC00046826	PETALUMA AIRPORT, CA US	10/28/2016	1.37
USC00046826	PETALUMA AIRPORT, CA US	10/30/2016	0.49
USC00046826	PETALUMA AIRPORT, CA US	10/31/2016	0.14

Rain Data from Petaluma Airport
3/26/2014 to 3/17/2019

USC00046826	PETALUMA AIRPORT, CA US	11/1/2016	0.24
USC00046826	PETALUMA AIRPORT, CA US	11/19/2016	1.3
USC00046826	PETALUMA AIRPORT, CA US	11/20/2016	0.51
USC00046826	PETALUMA AIRPORT, CA US	11/23/2016	0.37
USC00046826	PETALUMA AIRPORT, CA US	11/25/2016	0.42
USC00046826	PETALUMA AIRPORT, CA US	11/27/2016	0.22
USC00046826	PETALUMA AIRPORT, CA US	12/8/2016	0.48
USC00046826	PETALUMA AIRPORT, CA US	12/9/2016	0.16
USC00046826	PETALUMA AIRPORT, CA US	12/14/2016	0.14
USC00046826	PETALUMA AIRPORT, CA US	12/15/2016	2.2
USC00046826	PETALUMA AIRPORT, CA US	12/23/2016	0.81
USC00046826	PETALUMA AIRPORT, CA US	1/2/2017	0.38
USC00046826	PETALUMA AIRPORT, CA US	1/3/2017	0.51
USC00046826	PETALUMA AIRPORT, CA US	1/4/2017	0.82
USC00046826	PETALUMA AIRPORT, CA US	1/7/2017	0.35
USC00046826	PETALUMA AIRPORT, CA US	1/8/2017	2.15
USC00046826	PETALUMA AIRPORT, CA US	1/9/2017	0.3
USC00046826	PETALUMA AIRPORT, CA US	1/10/2017	1.9
USC00046826	PETALUMA AIRPORT, CA US	1/11/2017	0.68
USC00046826	PETALUMA AIRPORT, CA US	1/12/2017	0.42
USC00046826	PETALUMA AIRPORT, CA US	1/18/2017	0.82
USC00046826	PETALUMA AIRPORT, CA US	1/19/2017	0.61
USC00046826	PETALUMA AIRPORT, CA US	1/20/2017	0.82
USC00046826	PETALUMA AIRPORT, CA US	1/21/2017	0.31
USC00046826	PETALUMA AIRPORT, CA US	1/22/2017	1.37
USC00046826	PETALUMA AIRPORT, CA US	1/23/2017	0.33
USC00046826	PETALUMA AIRPORT, CA US	2/2/2017	0.42
USC00046826	PETALUMA AIRPORT, CA US	2/3/2017	0.43
USC00046826	PETALUMA AIRPORT, CA US	2/4/2017	0.23
USC00046826	PETALUMA AIRPORT, CA US	2/6/2017	0.74
USC00046826	PETALUMA AIRPORT, CA US	2/7/2017	1.73
USC00046826	PETALUMA AIRPORT, CA US	2/8/2017	0.62
USC00046826	PETALUMA AIRPORT, CA US	2/9/2017	0.93
USC00046826	PETALUMA AIRPORT, CA US	2/10/2017	0.3
USC00046826	PETALUMA AIRPORT, CA US	2/16/2017	0.48
USC00046826	PETALUMA AIRPORT, CA US	2/17/2017	0.93
USC00046826	PETALUMA AIRPORT, CA US	2/18/2017	0.97
USC00046826	PETALUMA AIRPORT, CA US	2/19/2017	0.21
USC00046826	PETALUMA AIRPORT, CA US	2/20/2017	1.2
USC00046826	PETALUMA AIRPORT, CA US	2/21/2017	0.73
USC00046826	PETALUMA AIRPORT, CA US	3/5/2017	0.35
USC00046826	PETALUMA AIRPORT, CA US	3/6/2017	0.28
USC00046826	PETALUMA AIRPORT, CA US	3/21/2017	0.58
USC00046826	PETALUMA AIRPORT, CA US	3/22/2017	0.36
USC00046826	PETALUMA AIRPORT, CA US	3/24/2017	0.88
USC00046826	PETALUMA AIRPORT, CA US	3/27/2017	0.12
USC00046826	PETALUMA AIRPORT, CA US	4/7/2017	1.4

Rain Data from Petaluma Airport
3/26/2014 to 3/17/2019

USC00046826	PETALUMA AIRPORT, CA US	4/8/2017	0.52
USC00046826	PETALUMA AIRPORT, CA US	4/16/2017	0.11
USC00046826	PETALUMA AIRPORT, CA US	4/18/2017	0.28
USC00046826	PETALUMA AIRPORT, CA US	4/20/2017	0.1
USC00046826	PETALUMA AIRPORT, CA US	6/8/2017	0.18
USC00046826	PETALUMA AIRPORT, CA US	11/9/2017	1.06
USC00046826	PETALUMA AIRPORT, CA US	11/10/2017	0.19
USC00046826	PETALUMA AIRPORT, CA US	11/13/2017	0.13
USC00046826	PETALUMA AIRPORT, CA US	11/15/2017	0.17
USC00046826	PETALUMA AIRPORT, CA US	11/16/2017	1.36
USC00046826	PETALUMA AIRPORT, CA US	11/26/2017	0.42
USC00046826	PETALUMA AIRPORT, CA US	11/27/2017	0.32
USC00046826	PETALUMA AIRPORT, CA US	1/5/2018	0.32
USC00046826	PETALUMA AIRPORT, CA US	1/8/2018	1.33
USC00046826	PETALUMA AIRPORT, CA US	1/9/2018	1.38
USC00046826	PETALUMA AIRPORT, CA US	1/18/2018	0.12
USC00046826	PETALUMA AIRPORT, CA US	1/22/2018	0.79
USC00046826	PETALUMA AIRPORT, CA US	1/24/2018	0.35
USC00046826	PETALUMA AIRPORT, CA US	1/25/2018	0.32
USC00046826	PETALUMA AIRPORT, CA US	2/26/2018	0.13
USC00046826	PETALUMA AIRPORT, CA US	3/1/2018	1.03
USC00046826	PETALUMA AIRPORT, CA US	3/2/2018	0.43
USC00046826	PETALUMA AIRPORT, CA US	3/3/2018	0.27
USC00046826	PETALUMA AIRPORT, CA US	3/4/2018	0.1
USC00046826	PETALUMA AIRPORT, CA US	3/8/2018	0.11
USC00046826	PETALUMA AIRPORT, CA US	3/13/2018	0.33
USC00046826	PETALUMA AIRPORT, CA US	3/14/2018	0.28
USC00046826	PETALUMA AIRPORT, CA US	3/15/2018	0.25
USC00046826	PETALUMA AIRPORT, CA US	3/16/2018	0.32
USC00046826	PETALUMA AIRPORT, CA US	3/17/2018	0.4
USC00046826	PETALUMA AIRPORT, CA US	3/21/2018	0.5
USC00046826	PETALUMA AIRPORT, CA US	3/22/2018	0.93
USC00046826	PETALUMA AIRPORT, CA US	3/24/2018	0.15
USC00046826	PETALUMA AIRPORT, CA US	4/6/2018	2.55
USC00046826	PETALUMA AIRPORT, CA US	4/7/2018	1.1
USC00046826	PETALUMA AIRPORT, CA US	4/12/2018	0.18
USC00046826	PETALUMA AIRPORT, CA US	4/15/2018	0.12
USC00046826	PETALUMA AIRPORT, CA US	4/16/2018	0.53
USC00046826	PETALUMA AIRPORT, CA US	5/25/2018	0.35
USC00046826	PETALUMA AIRPORT, CA US	10/1/2018	0.3
USC00046826	PETALUMA AIRPORT, CA US	10/2/2018	1.04
USC00046826	PETALUMA AIRPORT, CA US	11/21/2018	0.38
USC00046826	PETALUMA AIRPORT, CA US	11/23/2018	1.11
USC00046826	PETALUMA AIRPORT, CA US	11/24/2018	0.49
USC00046826	PETALUMA AIRPORT, CA US	11/27/2018	0.31
USC00046826	PETALUMA AIRPORT, CA US	11/29/2018	1.85
USC00046826	PETALUMA AIRPORT, CA US	12/1/2018	0.45

Rain Data from Petaluma Airport
3/26/2014 to 3/17/2019

USC00046826	PETALUMA AIRPORT, CA US	12/5/2018	0.2
USC00046826	PETALUMA AIRPORT, CA US	12/14/2018	0.25
USC00046826	PETALUMA AIRPORT, CA US	12/16/2018	0.45
USC00046826	PETALUMA AIRPORT, CA US	12/17/2018	0.14
USC00046826	PETALUMA AIRPORT, CA US	12/21/2018	0.32
USC00046826	PETALUMA AIRPORT, CA US	12/24/2018	0.32
USC00046826	PETALUMA AIRPORT, CA US	12/25/2018	0.22
USC00046826	PETALUMA AIRPORT, CA US	1/5/2019	0.11
USC00046826	PETALUMA AIRPORT, CA US	1/6/2019	1.7
USC00046826	PETALUMA AIRPORT, CA US	1/7/2019	0.15
USC00046826	PETALUMA AIRPORT, CA US	1/9/2019	0.7
USC00046826	PETALUMA AIRPORT, CA US	1/15/2019	0.27
USC00046826	PETALUMA AIRPORT, CA US	1/16/2019	1.5
USC00046826	PETALUMA AIRPORT, CA US	1/17/2019	1.03
USC00046826	PETALUMA AIRPORT, CA US	1/20/2019	0.1
USC00046826	PETALUMA AIRPORT, CA US	2/2/2019	1.27
USC00046826	PETALUMA AIRPORT, CA US	2/3/2019	0.34
USC00046826	PETALUMA AIRPORT, CA US	2/4/2019	0.44
USC00046826	PETALUMA AIRPORT, CA US	2/5/2019	0.16
USC00046826	PETALUMA AIRPORT, CA US	2/8/2019	0.1
USC00046826	PETALUMA AIRPORT, CA US	2/10/2019	0.33
USC00046826	PETALUMA AIRPORT, CA US	2/13/2019	1.83
USC00046826	PETALUMA AIRPORT, CA US	2/14/2019	1.34
USC00046826	PETALUMA AIRPORT, CA US	2/25/2019	0.35
USC00046826	PETALUMA AIRPORT, CA US	2/26/2019	2.3
USC00046826	PETALUMA AIRPORT, CA US	2/27/2019	1.71
USC00046826	PETALUMA AIRPORT, CA US	3/2/2019	0.46
USC00046826	PETALUMA AIRPORT, CA US	3/5/2019	0.13
USC00046826	PETALUMA AIRPORT, CA US	3/6/2019	0.6
USC00046826	PETALUMA AIRPORT, CA US	3/9/2019	0.31
USC00046826	PETALUMA AIRPORT, CA US	3/10/2019	0.2
USC00046826	PETALUMA AIRPORT, CA US	3/11/2019	0.41